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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Date: March 21, 1994

Ms. Brenda Norton, PE
Atlantic Division, Naval Facilities Engineering Command
Environmental Quality Division
Code: 1822
Building N 26, Room 54
1510 Gilbert Street
Norfolk, Va 23511-2699

Re: Naval Weapons Station, Yorktown, Va.
Operable Unit One - Site 5, Surplus Transformer Storage Area
Review of draft *Proposed Plan*

Dear Ms. Norton:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Navy's draft *Proposed Plan* for Operable Unit One, the Surplus Transformer Storage Area (Site 5) at the Naval Weapons Station - Yorktown NPL site (WPNSTA), and we offer the following comments:

General Comments

- 1) In the past, EPA has not concurred with **final Proposed Plans** and **final Records of Decision** which contained contractors names and logos within these documents. It is the opinion of EPA-Region III that the issuance of Proposed Plans and Records of Decision are an inherently governmental function, documenting a final decision made by the U.S. Government, in this instance a joint decision by the Department of Defense (Department of the Navy) and the U.S. EPA. Therefore, we are requesting that the Navy's contractor(s) names and logos be removed from the *Proposed Plan* for Operable Unit One. EPA suggests that the Navy's logo(s), i.e. NAVFAC and the Naval Weapons Station-Yorktown, and EPA's logo be placed on the cover of the *Proposed Plan*, and any combination of these logos inserted on maps, diagrams, figures, tables, or any other illustrations contained in the *Proposed Plan* in place of the contractor's.

Specific Comments

- 1) Based upon the comments received from the Commonwealth of Virginia regarding its review of the draft *Proposed Plan* for Operable Unit One, EPA and the Navy have discussed the possibility of obtaining additional samples at Operable Unit One to address the Commonwealth's concerns. The proposed sampling will further characterize the conditions present at Operable Unit One. The additional sampling program will involve the Navy taking soil/sediment samples in and around the natural drainageway(s) leading away from Operable Unit One toward the York River. These soil/sediment samples will be analyzed for PCBs. Also, the EPA has agreed to take six soil samples in the vicinity of Operable Unit One at three designated locations. Of the six planned soil samples, three will be taken at a depth of 0-6", while the remaining three will be taken at the same location at a depth of between 18-24". The soil samples will be analyzed for the complete TCL/TAL list parameters. Additionally, EPA has agreed to take three groundwater samples in the Operable Unit

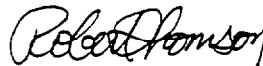
One vicinity, utilizing a direct method of sampling. The groundwater samples will be placed in a "downgradient" location of Site 5, to the north-northwest of Building 76. The three groundwater samples will be analyzed for PCBs.

This completes EPA's review comments on the draft *Proposed Plan* for Operable Unit One at the WPNSTA. At this point, there are two options that are available for proceeding with Operable Unit One. The first option involves the Navy issuing a draft final *Proposed Plan* to EPA, and upon receiving EPA acceptance of the draft final *Proposed Plan*, the Navy would publish the final *Proposed Plan* and hold a public information meeting. The first option generally follows the procedure outlined in the Section 9.7 (B) of the Federal Facilities Agreement. The second option involves the same procedure as option one except delaying the issuance of the draft final *Proposed Plan* to EPA until the additional sampling results are obtained. EPA prefers that first option, emphasizing the importance of publishing the *Proposed Plan* as soon as possible (within seven days of receiving EPA acceptance), and holding a public information meeting. If the first option is agreed upon by the Navy, the analytical results obtained from the additional sampling event at Operable Unit One could be included in the responsiveness summary of the *Record of Decision*.

In light of the above, EPA is requesting that the Navy please inform the Region of which option it prefers to proceed with in finalizing the *Proposed Plan* for Operable Unit One at the WPNSTA as soon as possible. If option one is desired by the Navy, EPA is requesting a coordination meeting with the Parties involved to discuss the logistics of holding the public information meeting and *Proposed Plan/Record of Decision* briefings for EPA (Navy and State) management, if need be.

If you have any questions, please feel free to call me at (215) 597-1110,

Sincerely,



Robert Thomson, PE
VA/WV Superfund Federal Facilities (3HW71)

cc: Lisa Ellis (VDEQ, Richmond)
Jennifer Loftin (WPNSTA, Code 09E)
Paul Leonard (USEPA, 3HW71)